

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

OKLAHOMA FIREFIGHTERS PENSION
AND RETIREMENT SYSTEM, Individually
and on Behalf of All Others Similarly
Situated,

Plaintiff,

v.

DEUTSCHE BANK
AKTIENGESELLSCHAFT (F/K/A
DEUTSCHE BANK AG); DEUTSCHE
BANK SECURITIES INC.; CITIGROUP
GLOBAL MARKETS LIMITED;
CITIGROUP GLOBAL MARKETS INC.;
RBC EUROPE LIMITED; RBC CAPITAL
MARKETS LLC; HSBC BANK PLC; HSBC
SECURITIES (USA) INC.; MORGAN
STANLEY & CO. INTERNATIONAL PLC;
and MORGAN STANLEY & CO. LLC,

Defendants.

Case No. 1:23-cv-05095

The Honorable John G. Koeltl

**PLAINTIFF’S NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF
AMENDED STIPULATION AND AGREEMENT OF SETTLEMENT WITH
CITIGROUP GLOBAL MARKETS LIMITED, CITIGROUP GLOBAL MARKETS
INC., HSBC BANK PLC, HSBC SECURITIES (USA) INC., RBC EUROPE LIMITED,
RBC CAPITAL MARKETS, LLC, MORGAN STANLEY & CO. INTERNATIONAL
PLC, AND MORGAN STANLEY & CO. LLC**

PLEASE TAKE NOTICE that Plaintiff Oklahoma Firefighters Pension and Retirement System (“Plaintiff”) will, and hereby does, move the Court pursuant to Fed. R. Civ. P. 23(e) for an order (1) preliminarily approving the proposed amended settlement with Citigroup Global Markets Limited, Citigroup Global Markets Inc., HSBC Bank plc, HSBC Securities (USA) Inc., RBC Europe Limited and RBC Capital Markets, LLC, Morgan Stanley & Co. International plc, and Morgan Stanley & Co. LLC (together, “Settling Defendants”); (2) approving Huntington National

Bank as Escrow Agent; (3) approving A.B. Data, Ltd. as Claims Administrator; (4) approving proposed forms of notice to the proposed settlement class; and (5) authorizing notice as provided in the Order.

Submitted herewith in support of this Motion are the:

- (1) Plaintiffs' Memorandum of Law in Support of Motion for Preliminary Approval of Amended Stipulation and Agreement of Settlement with Settling Defendants; and
- (2) Declaration of Patrick Coughlin in Support of Motion for Preliminary Approval of Amended Stipulation and Agreement of Settlement with Settling Defendants and accompanying exhibits.

Dated: January 22, 2025

SCOTT+SCOTT ATTORNEYS AT LAW LLP

s/ Patrick Coughlin

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Class Counsel*

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

s/ Patrick Coughlin
PATRICK COUGHLIN